

**IN THE UNITED DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

# National Football League Players' Concussion Injury Litigation

No. 2:12-md-02323-AB

MDL No. 2323

**MOTION FOR LEAVE TO APPEAR  
TELEPHONICALLY AT THE  
ORGANIZATIONAL MEETING  
FOR ALL OPT OUT PLAINTIFFS  
SCHEDULED FOR MARCH 27, 2017**

Civ. Action No. 13-cv-4549

Plaintiffs LEWIS BUSH, deceased by his Successor in Interest DEE BUSH; DEE BUSH an individual; DANIELLE BUSH, and individual; LEWIS BUSH, Jr., a minor, by his Guardian ad Litem, ELIZABETH FOX; and MAKAI BUSH, a minor, by her Guardian ad Litem CLEO BUSH (hereinafter "Plaintiffs"); hereby move this Court for an order granting leave for Neal A. Markowitz of Thorsnes Bartolotta McGuire LLP, counsel for Plaintiffs, to appear telephonically for the Organizational Meeting for all Opt Out Plaintiffs scheduled for **March 27, 2017, at 10:00 a.m.** In support hereof, Plaintiffs state:

1. This Court has set **March 27, 2017, at 10:00 a.m.**, for the Organizational Meeting for all Opt Out Plaintiffs.

2. Mr. Markowitz is a resident of San Diego County, California.

3. Plaintiffs respectfully request that this Court permit Mr. Mark

appear telephonically to avoid the time and expense associated with travel.

Philadelphia, Pennsylvania, from San Diego, California

1 WHEREFORE, Plaintiffs respectfully request Mr. Markowitz be permitted to  
2 appear by telephone at the meeting scheduled for **March 27, 2017, at 10:00 a.m.**  
3

4 Dated: February 28, 2017

THORSNES BARTOLOTTA McGuire LLP

5 By: /s/ Neal A. Markowitz

6 NEAL A. MARKOWITZ (CA SBN 201692)

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14 Attorneys for Plaintiffs LEWIS BUSH, DEE  
15 BUSH, DANIELLE BUSH, LEWIS BUSH,  
16 Jr., and MAKAI BUSH

17 *Certificate of Service*

18 On February 28, 2017, I electronically filed a copy of the foregoing  
19 document through the CM/ECF system for the United States District Court for the  
20 Eastern District of Pennsylvania, which will send a notice of electronic filing to all  
21 counsel of record and make it available for viewing and downloading from the  
22 CM/ECF system.

23 Bv: /s/ Neal A. Markowitz

24 Neal A. Markowitz